

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. : <u>03-</u>
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	:	
v.	:	DATE FILED: _____
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	:	
	:	
JOHNNIE CORLEY	:	VIOLATIONS:
	:	
	:	18 U.S.C. § 371 (Conspiracy to commit armed bank robbery - 1 Count)
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	:	18 U.S.C. § 2113(d) (Armed bank robbery - 1 Count)
	:	
	:	18 U.S.C. § 924(c) (Using and carrying a firearm during a crime of violence - 1 Count)
	:	
	:	18 U.S.C. § 2 (Aiding and Abetting)
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	:	Notice of Forfeiture
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INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, the Norsco Federal Credit Union, 1001 Sterigere Street, Building 57, Norristown, Pennsylvania, was a credit union whose deposits were insured by the National Credit Union Administration Board

2. On or about June 16, 2003, at Norristown, in the Eastern District of Pennsylvania and elsewhere, defendant

JOHNNIE CORLEY

conspired and agreed, with others known and unknown to the grand jury to commit an offense against the United States, that is, to knowingly and unlawfully take money from employees of the Norsco Federal Credit Union by force and violence and by intimidation, and to put in jeopardy the lives of persons by the use of a dangerous weapon, in violation of Title 18, United States Code, Section 2113(d).

MANNER AND MEANS

3. It was part of the conspiracy that the defendant JOHNNIE CORLEY and others known and unknown to the grand jury decided to rob the Norsco Federal Credit Union, 1001 Sterigere Street, Building 57, Norristown, Pennsylvania.

It was further a part of the conspiracy that:

4. The defendant JOHNNIE CORLEY and others known and unknown to the grand jury obtained firearms to use during the commission of the bank robbery.

5. The defendant JOHNNIE CORLEY and others known and unknown to the grand jury obtained disguises, including baseball caps, bandannas and a fake beard to use as disguises during the commission of the bank robbery.

OVERT ACTS

In furtherance of the conspiracy, defendant JOHNNIE CORLEY and others known and unknown to the grand jury committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about June 16, 2003, defendant JOHNNIE CORLEY and two other

accomplices purchased bandannas, baseball caps and fake hair.

2. On or about June 16, 2003, defendant JOHNNIE CORLEY and two other accomplices stole a 1995 maroon Dodge Caravan from the Wissahickon Regional Rail Station.

3. On or about June 16, 2003, defendant JOHNNIE CORLEY and two other accomplices “staged” the stolen maroon Dodge Caravan in an alleyway near the Norsco Federal Credit Union.

4. On or about June 16, 2003, defendant JOHNNIE CORLEY and two other accomplices entered the bank and used an umbrella to prop open the bank door so that they would not be locked inside.

5. On or about June 16, 2003, defendant JOHNNIE CORLEY and two other accomplices held the bank employees at gun point and took approximately \$48,729 of United States currency, which they put in a bright multi-colored pillow case.

6. On or about June 16, 2003, defendant JOHNNIE CORLEY took the surveillance tape from the bank’s VCR.

7. On or about June 16, 2003, defendant JOHNNIE CORLEY and two other accomplices fled on foot to the stolen maroon van and drove to pick up defendant CORLEY’s white van which was parked at George and Chain Streets, Norristown, PA.

8. On or about June 16, 2003, defendant JOHNNIE CORLEY and two other accomplices drove to a residence in Norristown where they counted and later split the stolen money.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 16, 2003, at Norristown, in the Eastern District of Pennsylvania,
defendant

JOHNNIE CORLEY

knowingly and unlawfully, by force and violence, and by intimidation, took from, and aided and abetted the taking from, employees of the Norsco Federal Credit Union, Norristown, PA (hereafter “the credit union”), lawful currency of the United States, that is, approximately \$48,729, belonging to, and in the care, custody, control, management and possession of the credit union, the deposits of which were insured by the National Credit Union Administration Board, and in so doing, defendant JOHNNIE CORLEY knowingly and unlawfully assaulted and put in jeopardy, and aided and abetted the assaulting and putting in jeopardy, the lives of the employees of the Credit Union, and other persons, by use of a dangerous weapon, that is, two handguns.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 16, 2003, at Norristown, in the Eastern District of Pennsylvania,
defendant

JOHNNIE CORLEY

knowingly used and carried, and aided and abetted the use and carrying of firearms, that is, two handguns, during and in relation to a crime of violence for which he may be prosecuted in the Court of the United States, that is, conspiracy to commit bank robbery and the bank robbery of the Norsco Federal Credit Union, 1001 Sterigere Street, Building 57, Norristown, Pennsylvania, in violation of Title 18 United States Code Sections 371 and 2113(d).

In violation of Title 18, United States Code, Sections 924(c) and 2.

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 371 and 2113, set forth in Counts One and Two of this Indictment, defendant

JOHNNIE CORLEY

shall forfeit to the United States of America, pursuant to Title 18, United States Code Section 981(a)(1)(C) and Title 28, United States Code Section 2461, any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense, as charged in this Indictment, including, but not limited to:

(a) \$48,729 in bank robbery proceeds.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney